

UNITED STATES DISTRICT COURT
DISTRICT OF PUERTO RICO

ANGEL ORTIZ ANGLERO AND REINALDO
ILARRAZA MEDINA

Plaintiffs

vs.

CROWLEY TOWING AND TRANSPORTATION
COMPANY AND SEAFARERS INTERNATIONAL
UNION OF NORTH AMERICA, ATLANTIC,
GULF, LAKES AND INLAND WATERS
DISTRICT, AFL-CIO

Defendants

* * * * *
ORLANDO RODRIGUEZ et al.

Plaintiffs

vs.

CROWLEY TOWING AND TRANSPORTATION
COMPANY et al.

Defendants

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* CIVIL NO. 97-2437 (CCC)
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* JURY TRIAL REQUESTED
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CIVIL NO. 98-1548 (CCC)

JURY TRIAL REQUESTED

PLAINTIFFS VERIFIED STATEMENT

We, ANGEL ORTIZ ANGLERO and REINALDO ILARRAZA MEDINA, of
legal age, married and residents of Carolina, Puerto Rico, state
under oath as follows:

1. We are the plaintiffs in the instant case.
2. We were former employees of Crowley and SIU union member
in good standing.
3. We have carefully reviewed the facts presented in the

attached STATEMENT OF UNCONTESTED MATERIAL FACTS and state that we have personal knowledge of those facts and that the same are true and correct to the best of our knowledge.

4. We declare, under penalty of perjury, that we have personal knowledge of those facts and that the same are true and correct to the best of our knowledge.

In San Juan, Puerto Rico, this 30 day of August 2004.



ANGEL ORTIZ ANGLERO



REINALDO ILARRAZA MEDINA